

1 Mark S. Askanas (SBN 122745)
Dylan B. Carp (SBN 196846)
2 Tara L. Riedley (SBN 236508)
JACKSON LEWIS LLP
3 199 Fremont Street, 10th Floor
San Francisco, California 94105
4 Telephone: (415) 394-9400
Facsimile: (415) 394-9401
5 *askanasm@jacksonlewis.com*

6 Attorneys for Plaintiff
CRUMP INSURANCE SERVICES, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 CRUMP INSURANCE SERVICES, INC.,

12 Plaintiff,

13 v.

14 MICHAEL P. MCGRATH, an individual,
ALL RISKS, LTD., a corporation, and
15 Does 1 through 50, inclusive,

16 Defendants.

Case No. C-07-4636 MMC

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO COMPEL
DEFENDANT ALL RISKS, LTD. TO
RESPOND TO REQUESTS FOR
PRODUCTION NOS. 4, 7 AND 26 AND
TO PRODUCE UNREDACTED
DOCUMENTS AND MOTION TO
COMPEL MICHAEL MCGRATH,
NICHOLAS CORTEZI, AND
CYNTHIA MARTY TO APPEAR FOR
FURTHER DEPOSITIONS
REGARDING THE DOCUMENTS**

Date: July 25, 2008
Time: 9:00 a.m.
Courtroom: 7

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23 The above-entitled motion came on for hearing before the above-entitled Court on July
24 25, 2008, Dylan B. Carp appearing for Plaintiff Crump Insurance Services, Inc. ("Crump"), and
25 Donna Rutter appearing for Defendants All Risks, Ltd. ("All Risks") and Michael P. McGrath
26 ("McGrath"), Nicholas Cortezi ("Cortezi"), and Cynthia Marty ("Marty").

27 IT IS HEREBY ORDERED that the motion is GRANTED. All Risks is ORDERED to
28 produce within ten days of the date of this Order all documents responsive to Crump's Request

1 for Production Nos. 4, 7, and 26, and all documents responsive to Crump's Request for
2 Production Set One without any redactions.

3 Crump's Request for Production ("RFP") No. 4 is not overly broad because it seeks
4 documents directly relevant to Crump's claim that McGrath wrongfully assisted All Risks in
5 recruiting Marty from Crump, as well as other claims, and may disclose wrongful solicitation of
6 or interference with other Crump employees. All Risks' objection that the request assumes facts
7 not in evidence is non-sensical in this context. All Risks' counsel stated in writing that no
8 document was withheld on the ground of the attorney-client privilege or attorney work product
9 doctrine.

10 Crump's RFP No. 7 is not overly broad because it seeks documents directly relevant to
11 Crump's claim that McGrath wrongfully assisted All Risks in recruiting Marty from Crump, as
12 well as other claims. The responsive documents and information are not protected by the right to
13 privacy or the right is outweighed by Crump's right to discover the documents and information.

14 Crump's RFP No. 26 is not overly broad and does not seek irrelevant documents because
15 it seeks documents directly relevant to Crump's claim that McGrath wrongfully assisted All Risks
16 in recruiting Marty from Crump, as well as other claims. All Risks' objection that the request
17 assumes facts not in evidence is non-sensical in this context. The responsive documents and
18 information are not protected by the right to privacy or the right is outweighed by Crump's right
19 to discover the documents and information.

20 The information that All Risks redacted from its document production is not protected by
21 the right to privacy or the right is outweighed by Crump's right to discover the information.

22 IT IS FURTHER ORDERED that McGrath, Cortezi, and Marty make themselves
23 available for further depositions to answer questions regarding the documents that are the subject
24 of this Order.

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26 DATED: _____, 2008 _____
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